Appln. No.: 09/748,995
Amdt. Dated September 23, 2003
Reply to Office Action dated June 23, 2003

Status of Claims

Claims 1-8 are pending in the application. In the Office Action dated June 6, 2003, Claims 1-8 were rejected under 35 U.S.C. §102(e) as being anticipated by Anderson, Jr., et al (U.S. Patent 6,119,051). Claims 1-4 were also rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over Claim 1 of U.S Patent No. 6,343,327.

Anticipation Rejections Under 35 U.S.C. § 102(e)

Applicants respectfully traverse the rejections of claims 1-8 as anticipated by the Anderson reference. In particular, the asserted reference fails to disclose the steps of:

> transmitting the printstream to a workstation computer coupled to the one or more inserter systems;
> interpolating the printstream in the workstation computer to generate a reprint database containing electronic files corresponding to each of the printed documents produced by the printer;
> interpolating the printstream in the work station computer to generate a job tracking database containing job level data for the mail pieces that are to be assembled in the one or more inserter systems.

Claim 1.

These missing claim steps are pertinent to a problem in the prior art whereby instructions for controlling the inserter machine are generated by a mainframe computer remote from the inserter devices to be used in creating the mail pieces. As stated in the present application:

> Generally, high volume mailers that process large mail runs on a continuous basis use several inserter systems in parallel to achieve a desired, high volume, mail run rate. However, each one these several inserter

systems are commonly not of the same manufacturer. For example, some of the inserter systems may be manufactured by Pitney Bowes Inc., well others may be manufactured by third party vendors such as Bell & Howell, Böwe or Kern. Wherein each of these third party inserter system requires its own native MRDF. Thus if a high volume mailer adds third party equipment relative to its existing inserter systems, modification of how the MRDF is generated would be needed in the mailer's mainframe computer. But, as pointed out above, mailers are reluctant to do this in view of the complexity and cost involved.

Therefore, the control of multiple inserter systems running a single mail run has been limited to controlling each inserter system separately from one another. Such control requires an inspection of some type to verify the integrity of the completed mail run. Thus, such high volume mailers have given up the mail run integrity associated with the MRDF processing on multiple inserter systems.

It is thus an object of the present invention to provide MRDF processing using the multiple inserter systems while not requiring modification of the mailers legacy mainframe computer. It Is a further object of the present invention to achieve the same level of mail run integrity for a mail run processed on multiple inserter systems as would be achieved if processed on a single inserter system.

Page 2, line 11, to page 3, line 2.

Thus, the claimed method steps of the present invention, change the location and manner of creating the instructions for controlling inserter machines of varying types.

The present invention overcomes the shortcomings of requiring the MRDF that is downloaded from the mainframe to be in a proprietary format suitable for interpolation by the ISC of the inserter systems coupled to the work station that is receiving the MRDF. As will be described In detail below, the present invention eliminates the requirement that the MRDF be processed on the mainframe and downloaded to the work station as it rather

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provides a system and method for downloading the
printstream of the mail run to the work station (instead of
the MRDF) for enabling the work station to process the
mail run on multiple inserter systems regardless of the
manufacture, or more precisely, the proprietary type of
ISC associated with each inserter system.

Page 6, lines 8-16.

The asserted Anderson reference does not include any of the recited steps for
using the "workstation computer" to perform the work that solves the prior art
problem. Rather Anderson teaches the same type of system that is described as
deficient in the background of the present application. "Applications on the
mainframe side send print images from a host mainframe **40** , for instance to printers
50, and Intellasert Data File (IDF) data to the database server computer **10**."
Anderson, Col 4, lines 6-9. Thus, Anderson's IDF file is created on a mainframe, and
the same problem exists for controlling the creation of documents as in the
acknowledged prior art.

Anderson does not teach " transmitting the printstream to a workstation
computer coupled to the one or more inserter systems," because it only teaches
sending printstream data to a printer. Instead of sending a printstream for
interpolation, Anderson sends the pre-made IDF data, like the known prior art.
Because the printsream data is never sent to a workstation in Anderson, the further
two "interpolating" steps that occur at the workstation are never taught or suggested.

Because these same missing elements are included in independent claim 5,
and the dependent claims 2-4 and 6-8, the rejections of those claims should be
similarly withdrawn.

Double Patenting Rejections

Claims 1-4 were also rejected under the judicially created doctrine of
obviousness-type double patenting as being unpatentable over Claim 1 of U.S Patent
No. 6,343,327. A terminal disclaimer is being filed herewith that disclaims the term of